

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ROOCHI TRADERS INCORPORATED,

Plaintiff,

-against-

TIP TOP TEES INC., GLAMOUR LINE
INC., GLAMOUR (USA), INC., ALPHA
MERCHANDISING CORP., ROSE DEAL,
INC., HARYASH PAUL, MOHAMMED
RAHMAN, MOHAMMED FAROQUE,
JOHN DOES 1-10, JANE DOES 1-10, and
XYZ COMPANIES 1-10,

Defendants.

CIVIL ACTION NO.

***EX PARTE* MOTION FOR ENTRY OF
PROTECTIVE ORDER
PERMITTING ROOCHI TRADERS
INCORPORATED TO FILE
DOCUMENTS UNDER SEAL**

**[FILED UNDER SEAL PURSUANT TO
15 U.S.C. § 1116]**

Plaintiff Roochi Traders, Incorporated (“Roochi Traders”), by and through its counsel, respectfully moves the Court for entry of a protective order permitting Roochi Traders to file under seal its Motions for Temporary Restraining Order, Seizure Order, Asset Restraining Order, Expedited Discovery Order, and Order to Show Cause for Preliminary Injunction. In support of its motion, Roochi Traders states as follows:

1. Roochi Traders wishes to file Motions for Temporary Restraining Order, Seizure Order, Asset Restraining Order, Expedited Discovery Order, and Order to Show Cause for Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65 and the Trademark Act of 1946, 15 U.S.C. §§ 1051, *et seq.*, as amended by the Trademark Counterfeiting Act of 1984, Public Law 98-473 (October 12, 1984) and the Anti-Counterfeiting Consumer Protection Act of 1996, Pub. L. 104-153 (July 2, 1996), and for violation of the Racketeer Influenced and Corrupt Organizations (“RICO”) Act as well as trademark infringement, unfair competition, dilution and deceptive acts and practices under the laws of the State of New York, for the reason that

Defendants are distributing, offering for sale and/or selling goods bearing counterfeit reproduction of Plaintiff's federally registered trademark as set forth in Plaintiff's complaint in the above-captioned case.

2. Roochi Traders seeks entry of a Protective Order permitting it to file under seal its Motions for Temporary Restraining Order, Seizure Order, Asset Restraining Order, Expedited Discovery Order, and Order to Show Cause for Preliminary Injunction.

3. Pursuant to 15 U.S.C. § 1116(d)(8) pertaining to counterfeit goods, "[a]n order under this subsection, together with the supporting documents, shall be sealed until the person against whom the order is directed has an opportunity to contest such order, except that any person against whom such order is issued shall have access to such order and supporting documents after the seizure has been carried out."

WHEREFORE, for these reasons, Roochi Traders respectfully requests that the Court grant its Motion For Entry of Protective Order Permitting Roochi Traders to File Documents Under Seal, and Order that the document referred to above be placed under seal.

Dated: April 10, 2008

By



Michelle Mancino Marsh (MM 1494)
Mimi K. Rupp (MR 0007)

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Attorneys for Plaintiff
Roochi Traders Incorporated

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ROOCHI TRADERS INCORPORATED,

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TIP TOP TEES INC., GLAMOUR LINE
INC., GLAMOUR (USA), INC., ALPHA
MERCHANDISING CORP., ROSE DEAL,
INC., HARYASH PAUL, MOHAMMED
RAHMAN, MOHAMMED FAROQUE,
JOHN DOES 1-10, JANE DOES 1-10, and
XYZ COMPANIES 1-10,

Defendants.

CIVIL ACTION NO.

**[PROPOSED] ORDER FOR ENTRY OF
PROTECTIVE ORDER
PERMITTING ROOCHI TRADERS
INCORPORATED TO FILE
DOCUMENTS UNDER SEAL**

Pursuant to 15 U.S.C. § 1116(d)(8), the Court finds that good cause exists for entry of a protective order permitting Roochi Traders Incorporated to file documents under seal. Accordingly, IT IS HEREBY ORDERED THAT:

- (1) Roochi Traders' Motion For Entry of Protective Order Permitting Roochi Traders to File Documents Under Seal is GRANTED, and

- (2) Roochi Traders is permitted to file under seal its Motions for Temporary Restraining Order, Seizure Order, Asset Restraining Order, Expedited Discovery Order, and Order to Show Cause for Preliminary Injunction Against Tip Top Tees Inc., Glamour Line Inc., Glamour (USA), Inc., Alpha Merchandising Corp., Rose Deal, Inc., Haryash Paul, Mohammed Rahman, Mohammed Faroque, John Does 1-10, Jane Does 1-10, and XYZ Companies 1-10.

DATED this ____ day of _____, 2008

United States District Court Judge